

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

FILED
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U.S. DISTRICT COURT
WESTERN DIVISION

LITCHFIELD FINANCIAL
CORPORATION,
TEXTRON FINANCIAL
CORPORATION,
LAND FINANCE COMPANY,
Plaintiffs,

CIVIL ACTION NO. 04-CV-30076 KPN

v.

BUYERS SOURCE REAL ESTATE
GROUP, BUYERS SOURCE VALLEY
GROUP, LLC,
BUYERS SOURCE SUGARMILL, LLC,
BUYERS SOURCE, SAVANNAH
LAKES, LLC, THOMAS H. BREWER,
FREDERICK D. BLAKE, BETTY M.
BREWER, SUSAN GARD, HENRY
MONTGOMERY, LANNIE CAMPBELL,
RONALD P. FERGUSON, STEPHEN A.
HUDGINS, ESQUIRE, STEPHEN A.
HUDGINS, PC, HUDGINS &
STALLINGS, PC, J. VANCE
STALLINGS, ESQUIRE, JOHN C.
LUMPKIN, ESQUIRE,
JOHN C. LUMPKIN, PC, WILLIAM
GREGORY SEIGLER, ESQUIRE,
Defendants.

AFFIDAVIT OF CHARLES M. LOLLAR
IN SUPPORT OF ADMISSION AS COUNSEL *PRO HAC VICE*

I, Charles M. Lollar, being duly sworn, do hereby depose and say as follows:

1. I am one of the principal attorneys for the litigation referred to above. I make this Affidavit in support of my application to be admitted *pro hac vice* in this action.

2. I am a member in good standing of the Bar of the State of Virginia, admitted to practice before all courts in Virginia since 1977. I principally practice law in Virginia. I am admitted to practice before the United States District Court for the District

of Virginia. I am also a member in good standing of the Bar of the North Carolina, admitted to practice before all courts in North Carolina since 1977, including the United States District Court for the District of North Carolina. There are no disciplinary proceedings pending against me in any jurisdiction.

3. I have become associated in this matter with the law firm of Devine, Millimet & Branch, Professional Association, which is acting as local counsel. George R. Moore, an attorney at the firm, has advised me that the attorneys in his firm are qualified to practice law.

4. I am a partner in the law firm of Tanner, Mulkey, Gordon & Lollar, P.C., which has a relationship with Defendants, John C. Lumpkin, Esquire, John C. Lumpkin, P.C., Stephen A. Hudgins, Esquire, Stephen A. Hudgins, P.C., and Hudgins & Stallings, P.C.. I am a primary attorney assigned to work on this matter because of my relationship with the Defendants and familiarity with the facts of the instant matter. Accordingly, good cause exists for my admission *pro hac vice*.

5. I am aware of the requirements of this Court concerning attorneys admitted *pro hac vice* and agree, to the best of my ability, to faithfully comply with the requirements.

6. Based on the foregoing, I respectfully request this Court grant my application for admission *pro hac vice* for purposes of this litigation.

Dated: August 24, 2004

By: 

Charles M. Lollar, Esquire
Tanner, Mulkey, Gordon & Lollar, P.C.
5700 Lake Wright Drive, Suite 102
Norfolk, VA 23502
Main Tel: 757-274-7000

STATE OF VIRGINIA

City
COUNTY OF Norfolk

On this 24th day of August, 2004, before me, the undersigned notary public, personally appeared Charles M. Lollar, proved to me through satisfactory evidence of identification, which were Virginia Driver's License, and Notary Public Certificate, to be the person whose name is signed on the preceding or attached document, and acknowledged to me that he signed it voluntarily for its stated purpose.

Norma Sue Moorehan
Notary Public
My Commission Expires: July 31, 2006